UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

SILAS CALHOUN and EMILY CALHOUN, Individually and as Parents and Next Friends of ESTELLA CALHOUN,

Plaintiff,

Civil Action No. 04-10480-RGS

v.

UNITED STATES OF AMERICA

Defendant.

The United States respectfully request, with the assent of the plaintiffs, an extension of time of 30 days until March 9, 2007, to complete Defendant's expert reports. Due to an urgent personal medical matter, undersigned counsel will not be able to complete all of the United States' expert reports by February 9, 2007. This is the final discovery task to be completed in this action and the extension will not affect or change any other deadlines or the trial date in this action.

This Motion is made in good faith and is not made to delay the action, or for any other

improper purpose.

Estella Calhoun,

For the Plaintiffs, For the Defendant,

Silas and Emily Calhoun, UNITED STATES OF AMERICA

MICHAEL J. SULLIVAN
United States Attorney

/s/ Michael S. Appel 2/6/2007 (By: APG) By: /s/ Anton P. Giedt 2/6/2007

Michael S. Appel, BBO# 543898 Anton P. Giedt

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CERTIFICATE OF SERVICE

Suffolk, ss.

Boston, Massachusetts DATE: February 6, 2007

I, Anton P. Giedt, Assistant U.S. Attorney, do hereby certify that I have this day served a copy of the foregoing upon the Plaintiffs' counsel of record by Electronic Filing.

/s/ Anton P. Giedt Anton P. Giedt Assistant U.S. Attorney

PLAINTIFFS' COUNSEL:

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